

January 11, 2022

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Proceeding Related to S.C. Code Ann. §58-37-40 as amended by Act 90 of 2021;
Development and Submittal of Santee Cooper's 2023 Triennial Integrated Resource Plan
to the Commission

Dear Ms. Boyd:

On June 15, 2021, Governor Henry McMaster signed into law Act 90 of 2021. Among other things, Act 90 revises the requirements concerning the development, submittal and review of Santee Cooper's triennial Integrated Resource Plan (IRP). The purpose of this letter is to respectfully propose a going forward plan to implement S.C. Code Ann. §58-37-40, as it has been recently amended by Act 90, effective January 1, 2022¹.

Requirements Surrounding Santee Cooper's Triennial IRP Pre-Act 90

Immediately prior to Act 90, Santee Cooper was required to prepare triennially, like other electric energy providers in the State of South Carolina, an IRP consisting of all of the components enumerated and described in S.C. Code Ann. §58-37-40(B), as that provision had been amended by Act 62 of 2019: The South Carolina Energy Freedom Act.

Unlike other electric energy providers, Santee Cooper's IRP was submitted to the State Energy Office, rather than the Commission, and did not require the Commission's approval. In addition, Santee Cooper had the additional obligation of consulting with electric cooperatives and municipalities taking service from Santee Cooper in preparing its IRP.

Santee Cooper's last triennial IRP was published and submitted to the State Energy Office on December 23, 2020. A copy of that document is attached for the Commission's information.

¹ See, Act 90, Section 26

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Requirements Surrounding Santee Cooper's Triennial IRP Post-Act 90

As revised by Act 90, S.C. Code Ann. §58-37-40 requires Santee Cooper to submit its next triennial IRP, not with the State Energy Office, but rather to the Commission subject to the Commission's review and approval. Once Santee Cooper's next triennial IRP is approved by the Commission, Santee Cooper will be required to submit annual updates to that approved IRP with the Commission.

Like the IRPs of other electric energy providers in the state, Santee Cooper's IRP will continue to have the components enumerated and described in S.C. Code Ann. §58-37-40(B). In addition to those components and unlike the other electric utilities, Santee Cooper's next triennial IRP will also be required to include the analysis and components described in S.C. Code Ann. §58-37-40(A)(4)(a), (b), and (c).

Description of the Public Process and Consultations Informing Santee Cooper's 2023 Triennial IRP

S.C. Code Ann. §58-37-40(A)(3) requires that "The Public Service Authority shall develop a public process allowing for input from all stakeholders prior to submitting the integrated resource plan. The integrated resource plan must be developed in consultation with the electric cooperatives and municipally owned electric utilities purchasing power and energy from the Public Service Authority and consider any feedback provided by retail customers and shall include the effect of demand side management activities of the electric cooperatives and municipally owned electric utilities that directly purchase power and energy from the Public Service Authority or sell power and energy generated by the Public Service Authority."²

In order to meet the statutory requirements, Santee Cooper intends to initiate its consultation/stakeholder process in the first quarter of 2022. This process will involve a series of collaborative meetings designed to inform the content of the 2023 IRP. The process will evolve post-filing, and based on lessons learned, will work to provide input for Annual IRP updates and Triennial Update filing requirements. This process will be continuous.

The development of the 2023 IRP filing will involve a minimum of five, facilitated interactive stakeholder meetings. The initial group of stakeholders will include those listed in S.C. Code Ann. §58-37-40(A)(3), and will also include organizations representing environmental, economic justice, municipalities and industry, which traditionally have a stake in the outcomes of the IRP process. In addition, retail and industrial customers, and all other interested stakeholders will be made aware of the opportunity for their engagement in the process. The goal is to attract as large, robust, representative, and diverse a stakeholder group as possible.

² See, also, S.C. Code Ann. §58-37-40(A)(4)(c).

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A report summarizing progress to date and the input of stakeholders will be circulated to registered prospective attendees for review before each meeting. Additional opportunities for collaboration will involve stakeholders' ability to recommend their scenarios for analysis and consideration. Stakeholders will engage in post-meeting surveys to recommend changes to content, pace, and depth of conversation. In this way, they will have an opportunity to influence the agenda of meetings as the process proceeds. The Santee Cooper Board of Director's newly formed Stakeholder Committee will also play a vital role in these engagements and provide reports to the Board throughout the IRP development process.

Santee Cooper will establish a Web Portal to enable ongoing communication and coordination with stakeholders. This portal will provide access to the overall schedule, meeting agendas and summary notes as the IRP process proceeds. The portal will be the main vehicle for providing stakeholders with copies of presentation materials used in each of the meetings. In addition, the portal will enable stakeholders joining the process mid-stream to become acquainted with issues, conversations and decisions as they have occurred.

Recommended Date for the Filing of Santee Cooper's 2023 Triennial IRP

Santee Cooper respectfully recommends that May 15, 2023, be set as the date of the filing of Santee Cooper's 2023 triennial IRP. This would place Santee Cooper's triennial IRP filing roughly midway between the anticipated 2023 IRP filings of Dominion Energy South Carolina and Duke Energy Carolinas/Duke Energy Progress. Spacing the IRPs in this fashion would allow the Office of Regulatory Staff and the Commission to better utilize their limited resources in analyzing and conducting the Commission proceedings associated with these various filings. The recommended filing date also affords the time needed for stakeholder input and fulfillment of all requirements entailed in the IRP process. Under this schedule, Santee Cooper's 2023 triennial IRP would be filed approximately 29 months since the date of Santee Cooper's last triennial IRP on December 23, 2020.

If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

/s/Stephen R. Pelcher

Stephen R. Pelcher

Attachment

cc: Andrew M. Bateman, Esquire
Nanette S. Edwards, Esquire
Benjamin P. Mustian, Esquire
Pamela J. Williams, Esquire
(all via electronic mail w/attachment)